

# **Air Quality Operating Permit and Registration Requirements for Perchloroethylene Dry Cleaners**

## **BACKGROUND**

### ***Why Am I Regulated?***

The Clean Air Act Amendments of 1990 directed the United States Environmental Protection Agency (EPA) to regulate the emissions of 189 chemical compounds designated as Hazardous Air Pollutants (HAPs). To meet this requirement, EPA developed National Emission Standards for Hazardous Air Pollutants (NESHAPs). Each NESHAP requires each applicable facility to implement the Maximum Achievable Control Technology (MACT) standard. The MACT standards represent EPA's effort to minimize the emissions of HAPs and are determined by control technologies already being employed throughout each respective industry.

EPA has designated perchloroethylene to be a hazardous air pollutant and has decided to regulate facilities that use perchloroethylene (dry cleaners and others that use the solvent in degreasing operations). In September 1993, EPA finalized the NESHAP that specifies the requirements for dry cleaning facilities using perchloroethylene. These regulations are found at 40 CFR (Code of Federal Regulations) Part 63, Subpart M and deal specifically with dry cleaning operations that use perchloroethylene as the cleaning solvent.

## **AIR QUALITY OPERATING PERMITS**

Current Idaho Law requires the Idaho Department of Environmental Quality to issue Tier I Operating Permits to all sources regulated under Title V of the Clean Air Act. This includes sources regulated by NESHAPs. A number of smaller sources will be impacted that may not have been subject to Idaho permitting requirements prior to this time.

### ***How Does This Affect Me?***

All owners or operators of dry cleaning facilities that use perchloroethylene are NESHAP sources and are, therefore, subject to the Title V operating permit requirements.

Idaho's Department of Environmental Quality (DEQ) will be issuing Tier I (Title V) operating permits to the dry cleaners. When you need to obtain this operating permit depends on whether you are considered a major source or a minor source, referred to in the federal rules as large area sources or small area sources.

**Major Source.** A major source (one that may emit 10 tons per year or more of perchloroethylene) is defined as one of the following:

- Sources that use Dry-to-Dry Machines that consume more than 2,100 gallons of perchloroethylene a year;
- Sources that use Transfer Machines that consume more than 1,800 gallons of perchloroethylene a year; or
- Sources that use both Dry-to-Dry and Transfer Machines that consume more than 1,800 gallons of perchloroethylene a year.

All major sources that existed prior to May 1, 1994 should have submitted a complete operating permit application to the Department by June 1, 1996. All major sources that existed after May 1, 1994 should have a complete operating permit application to the Department no later than twelve months after commencing operation.

**Small and Large Area Sources.** Small and Large Area Sources are those that consume any amount of perchloroethylene less than the major source classification. These sources are also required to obtain a Title V Operation Permit. DEQ is not issuing operating permits to small and large area sources until June 1, 2006 if the source registers by May 1, 2004. Under this deferral, these sources must continue to comply with all of the operational requirements, emission limitations, and the reporting and record keeping requirements that are part of the federal and state regulations.

## **REGISTRATION REQUIREMENT**

DEQ believes that air quality in the State can be effectively managed by registering facilities and obtaining air emissions information without issuing operating permits or imposing fee requirements on these sources at this time.

Therefore, on June 23, 2000 the Idaho Board of Environmental Quality adopted a rule that allows facilities to register or go through full permitting. If you choose to register now, you will not need to submit an application for your air quality operating permit until June 1, 2005. If you choose **not** to register with DEQ at this time, you must submit your air quality operating permit application immediately, as it was required to be submitted to DEQ by June 1, 2000.

If you choose to register with DEQ, you must submit your completed registration form to DEQ no later than May 1, 2001.